1	TANCRED SCHIAVONI		
2	(pro hac vice application to be filed) STEPHEN H. WARREN (S.B. #136895)		
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8	Counsel for Century Indemnity Company, as successor to CCI Insurance Company,		
9	as successor to Insurance Company of North America		
10	UNITED STATES DISTRICT COURT		
11	SOUTHERN DISTRICT OF CALIFORNIA		
12			
13	Century Indemnity Company,	Case No. '21CV2011 L MDD	
14	Plaintiff,	DISCOVERY MATTER	
15	V.	CENTURY'S MOTION TO COMPEL ANDREW VAN ARSDALE TO	
16	Andrew Van Arsdale,	COMPLY WITH CENTURY'S	
17	Defendant.	SUBPOENAS TO TESTIFY AT A DEPOSITION AND PRODUCE	
18		RESPONSIVE DOCUMENTS	
19	Century Indemnity Company, as successor to CCI Insurance Company, as		
20	successor to Insurance Company of North America ("Century"), respectfully submits this Motion		
21	to Compel Andrew Van Arsdale to comply with Century's subpoena to testify at a deposition and		
22	subpoena to produce documents (the "Subpoenas"), both issued by Century on October 4, 2021.		
23	2. The Subpoenas relate to the chapt	er 11 proceedings, No. 1:20-bk-10343, pending	
24			
25	in the Bankruptcy Court for the United States District Court for the District of Delaware (the		
26	"Delaware Court") (the "Underlying Action"). Movant is a party in the Underlying Action. This		
27	Court has jurisdiction over this matter pursuant to Federal Rule of Civil Procedure 45(c) as the		
28	Subpoena required compliance in this District.		

CENTURY'S MOTION TO COMPEL

1	3. As stated in the Unopposed Motion to Transfer filed concurrently with this	
2	Motion, counsel for Mr. Van Arsdale does not oppose a transfer of this dispute to the Delaware	
3	Court. 1 Should this Court choose not to, however, Century submits that the Motion to Compel	
5	should be granted for the reasons stated in the accompanying Memorandum of Law.	
6	Dated: November 30, 2021 Respectfully Submitted, By: /s/ Karen Rinehart	
7 8	TANCRED SCHIAVONI (pro hac vice application to be filed)	
9	STĚPHEN H. WARREN (S.B. #136895) KAREN RINEHART (S.B. #185996) O'MELVENY & MYERS LLP	
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14	Counsel for Century Indemnity Company, as successor to CCI Insurance Company, as	
15	successor to CC1 Insurance Company, as successor to Insurance Company of North America	
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27	1 Con Standard Deal For A Oliver 19 2021 11 11 14 14 14 14 14 14 14 14 14 14 14	
28	 See Stamoulis Decl., Ex. A (Nov. 18, 2021 email from counsel to Mr. Van Arsdale to counsel to Century confirming no opposition to Century moving to transfer). - 2 - 	
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LOCAL CIVIL RULE CERTIFICATIONS

Pursuant to Local Civil Rule 26.1, counsel for Century certifies that it met and conferred via telephonic with counsel for Mr. Van Arsdale on October 20, 2021 and again on November 18, 2021 regarding the issues that are the subject of this Motion. Century's meet and confers were led by attorney Stamatios Stamoulis, local Delaware counsel to Century, whose signature was on the Subpoenas issued with respect to the Underlying Action. No resolution was reached, thus requiring the intervention of this Court as needed.

Further, pursuant to Local Civil Rule 5.3, the above and foregoing Motion was served upon counsel for Andrew Van Arsdale, by email and via first-class mail to:

Paul Starita
The Gomez Firm
655 W Broadway, Suite 1700
San Diego, CA 92101
pstarita@thegomezfirm.com

15 | Dated: November 30, 2021

Respectfully Submitted,

By: (ancred Shaim,

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Counsel for Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America

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